

**Tony Morales**

From: "Stephen L. Clark" <slclark@pacificcorisk.com>  
 To: "Tony Morales" <tmorales@malagacwd.org>  
 Cc: "Frank Cruz" <fcruz@malagacwd.org>; "Drew Gantner" <dgantner@pacificcorisk.com>  
 Sent: Wednesday, March 21, 2012 9:02 AM  
 Subject: Malaga: Results for Selenastrum testing performed on Malaga effluent collected March 13, 2012  
 Hello Tony,

We have completed the *Selenastrum* testing for the Malaga County Water District sample collected March 13, 2012. The results were as follows:

**Selenastrum Algal Growth Test**

Control – 2,820,000 cells/ml  
 6.25% effluent – 3,440,000 cells/ml  
 12.5% effluent – 3,690,000 cells/ml  
 25% effluent – 3,220,000 cells/ml  
 50% effluent – 2,690,000 cells/ml  
 100% effluent – 2,270,000 cells/ml

The effluent was toxic at that 100% effluent treatment. The NOEC was 75% effluent, resulting in 1.3 TUc. The IC25 was 87% effluent.

Based on our review of the Malaga NPDES permit, these results would trigger the following requirements:

*If the result of any accelerated toxicity test exceeds the monitoring trigger, the Discharger shall cease accelerated monitoring and initiate a TRE to investigate the cause(s) of, and identify corrective actions to reduce or eliminate effluent toxicity. Within thirty (30) days of notification by the laboratory of the test results exceeding the monitoring trigger during accelerated monitoring, the Discharger shall submit a TRE Action Plan to the Regional Water Board including, at minimum:*

- 1) *Specific actions the Discharger will take to investigate and identify the cause(s) of toxicity, including TRE WET monitoring schedule;*
- 2) *Specific actions the Discharger will take to mitigate the impact of the discharge and prevent the recurrence of toxicity; and*
- 3) *A schedule for these actions.*

*Within sixty (60) days of notification by the laboratory of the test results, the Discharger shall submit to the Regional Water Board a TRE Work Plan for approval by the Executive Officer. The TRE Work Plan shall outline the procedures for identifying the source(s) of, and reducing or eliminating effluent toxicity. The TRE Work Plan must be developed in accordance with EPA guidance.*

PER has written many TRE Work Plans for our clients and often assists with designing TRE WET monitoring schedules. Please let me know if you will need assistance in this area.

For the permit narrative above, Malaga does not need to continue with the current accelerated monitoring schedule but must "investigate and identify the cause(s) of toxicity, including TRE WET monitoring". It may be prudent to schedule a conference call so that we work through your needs and options.

3/21/2012